

CHRISTOPHER B. GHIO (259094)
christopher.ghio@dinsmore.com
CHRISTOPHER CELENTINO (131688)
christopher.ceentino@dinsmore.com
DINSMORE & SHOHL LLP
655 West Broadway, Suite 800
San Diego, California 92101
Tele: 619.400.0500
Fax: 619.400.0501

Sarah S. Mattingly (Ky. Bar 94257 – Admitted pro hac vice)
DINSMORE & SHOHL LLP
101 S. Fifth Street, Suite 2500
Louisville, KY 40202
Telephone: 859-425-1096
Facsimile: 502-585-2207
Sarah.mattingly@dinsmore.com

*Special Counsel to Richard A. Marshack, former
Chapter 11 Trustee for the Bankruptcy Estate of
The Litigation Practice Group PC and current
liquidating trustee of the LPG Liquidation Trust*

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re:

THE LITIGATION PRACTICE GROUP P.C.,
Debtor.

Case No. 8:23-bk-10571-SC

Adv. Proc. No. 8:23-ap-01148-SC

Chapter 11

RICHARD A. MARSHACK,
Plaintiff,

v.

JGW SOLUTIONS LLC,
Defendant.

**DECLARATION OF BRADFORD
("BRAD") LEE IN SUPPORT OF
SUPPLEMENTAL BRIEF**

1 I, BRADFORD (“BRAD”) LEE, declare as follows:

2 1. At all relevant times I was employed by Coast Processing, LLP (“Coast”), Litigation
3 Practice Group, PC (“LPG”), and Guardian Processing, LLP (“Guardian”) as stated more thoroughly
4 below. In my role at Coast, LPG, and Guardian, I reviewed thousands of files, ran numerous metric
5 reports, had access to their software, including accounting, Microsoft Outlook, Sharepoint, OneDrive,
6 Teams, Viva Engage, Airtable, cloud storage, domains, emails and customer relationship management
7 (“CRM”) databases, including DebtPayPro (“DPP”) and subsequently LUNA. I also was involved in
8 onboarding various marketing affiliates. I have been included in business meetings, prepared
9 documents and have assisted in the day to day operations and processes for all these entities and have
10 personal knowledge of, among many other things, the general business model for each entity, LPG
11 client file transfers, ACH processes and ACH processing companies, furniture, equipment, LPG work
12 product, LPG’s attorney network, IT infrastructure and organizational hierarchy and structure. I have
13 personal knowledge of the matters set forth herein and if called as a witness in this matter, I could and
14 would testify competently thereto.

15 2. In approximately, November, 2020 until July, 2021 I was employed as a payment
16 analyst at Coast. In approximately July, 2021 many of the functions performed by Coast were
17 integrated into LPG including my role as a business analyst. In my role as a business analyst at Coast
18 and LPG I prepared, had access to, reviewed and in many ways managed and/or assisted in the
19 management of Coast and LPG’s day to day processes and IT infrastructure discussed above including
20 the CRM. In my role at LPG I had numerous conversations with Tony Diab (“Diab”), in person, via
21 text and emails. I was present at many of the meetings wherein the day to day operations, finances and
22 business plans were discussed. I was also present during discussions Diab had related to the transfer
23 of LPG client files and funds derived from client ACH pulls to other entities and the role each entity
24 would have, including Oakstone Legal Group, PC (“Oakstone”), Guardian, Maverick Management
25 Group LLC, Phoenix Law, PC (“Phoenix”) and PrimeLogix, LLC.

26 3. Diab had many entities under his control, including but not limited to BAT, Inc.
27 (“BAT”), PrimeLogix, LLC (“PrimeLogix”), Vulcan Consulting, Inc. (“Vulcan”) and Maverick
28 Management Group, LLC (“Maverick”) (collectively “Entities”).

1 4. As the person who was ordered by Diab and set up the monthly pulls from LPG clients,
2 I am aware that such pulls were the primary source of funds transferred from LPG's ACH payments
3 processors (including but not limited to Revolv3) to Diab, BAT, Vulcan, Oakstone, PECC,
4 PrimeLogix and Maverick. Other money that came into these Entities were also all related to LPG
5 client files, as Diab would obtain loans or investor money, which would be deposited in these accounts,
6 despite being paid back with the funds derived from future consumer pulls or still other loans/investor
7 money.

8 5. The Entities were used by Diab as one of many bank accounts to hold LPG money,
9 derived from LPG consumer client funds through ACH pulls and from direct deposits of cash
10 from LPG or from one of the other entities that only held LPG money.

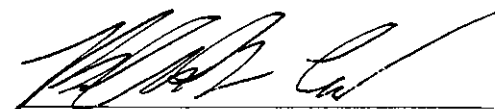
11 6. LPG frequently diverted the money pulled from its consumer clients and other fund
12 it received through investors and lenders to and through these Entities.

13 7. LPG would direct these Entities to pay affiliates (aka marketing cappers), MCA
14 lenders, and others with its diverted assets.

15 8. I was instructed by Diab how to manage the funds and I created disbursement reports
16 which others would then utilize to transfer these funds to and from these Entities and LPG
17 interchangeability.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct.

20
21 February 27, 2025


Bradford Lee

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
101 S. Fifth Street, Suite 2500, Louisville, Kentucky 40202

A true and correct copy of the foregoing document entitled (*specify*):

DECLARATION OF BRADFORD ("BRAD") LEE IN SUPPORT OF SUPPLEMENT BRIEF

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) March 3, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Sarah S. Mattingly on behalf of Plaintiff Richard A. Marshack sarah.mattingly@dinsmore.com
Richard A Marshack (TR) pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
United States Trustee (SA) ustregion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) March 3, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

JGW Solutions, LLC
Jonathan Jenkins
2600 Michelson Dr., #16000
Irvine, CA 92612

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) March 3, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

JUDGE'S COPY – VIA FEDEX

The Honorable Scott C. Clarkson
U.S. Bankruptcy Court – Central District of California
Ronald Regan Federal Building and Courthouse
411 West Fourth Street, Suite 5130, Courtroom 5C
Santa Ana, California 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

March 3, 2025 Jamie Herald
Date *Printed Name*

/s/ Jamie Herald
Signature